

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	HON. GENE E.K. PRATTER
	:	
v.	:	CRIM. NO. 18-101
	:	
	:	
MEHDI NIKPARVAR-FARD	:	

ORDER

AND NOW, this _____ day of June, 2023, upon consideration of the defendant's *Motion to Extend Modification of Conditions of Release*, it is hereby **ORDERED** that the said Motion is **GRANTED**. The modification of defendant's conditions of release which permit him to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week is extended for an additional sixty days. It is further **ORDERED** that the status of the completion of the repairs shall be reported to the Court in sixty (60) days hence.

By the Court:

HON. GENE E.K. PRATTER
JUDGE, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	HON. GENE E.K. PRATTER
	:	
v.	:	CRIM. NO. 18-101
	:	
	:	
MEHDI NIKPARVAR-FARD	:	

MOTION TO EXTEND MODIFICATION OF CONDITIONS OF RELEASE

The defendant, Mehdi Nikparvar-Fard, by his counsel, Caroline Goldner Cinquanto, Esquire, respectfully requests this Court grant his *Motion to Extend Modification of Conditions of Release* and in support thereof states the following:

1. On July 7, 2022, the Honorable Gene E.K. Pratter ordered that the defendant, Mehdi Nikparvar-Fard, be subject to location monitoring by a Global Positioning Device and not leave 400 Fairview Road, Penn Valley, Pennsylvania without the prior authorization of pretrial services or the Court [Doc. No. 433, ¶8].

2. On April 14, 2023, this Court granted defendant's *Motion to Modify Conditions of Release* which permitted the defendant to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week in order to perform necessary repairs on the home. The Court furthered ordered that the defendant provide the Court with status of the completion of the repairs sixty (60) days from the date of the Order [Doc. No. 604].

3. The status of the completion of the house located at 122 East 3rd Street is as follows: The house has been completely framed. Mr. Nikparvar-Fard is currently working on

insulating and installing the drywall, as well as installing electricity. Please see Exhibits 1 and 2, which are attached hereto.

4. Neither AUSA Christopher Parisi nor Pretrial Officer Charles Meissler object to the extension of the modification of the defendant's conditions of release for an additional sixty (60) days..

In conclusion, it is respectfully requested that the Court issue an Order extending the modification of the defendant's conditions of release which currently permits him to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week, with the requirement that the defendant provide a status of the completion of the repairs to the Court within sixty (60) days.

Respectfully submitted,

/s/ Caroline Goldner Cinquanto
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Counsel for Mehdi Nikparvar-Fard

Dated: June 14, 2023

CERTIFICATE OF SERVICE

I, Caroline Goldner Cinquanto, hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Motion to the following counsel:

AUSA Christopher Parisi
United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

//s// Caroline Goldner Cinquanto
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Dated: June 14, 2023